

May 22, 2003

Mr. Greg Hemmingsen  
The Cisco Companies  
602 North Shortridge Road  
Indianapolis, IN 46219

Re: Registered Construction and Operation Status,  
**097-16974-00362**

Dear Mr. Hemmingsen

The application from The Cisco Companies, received on March 25, 2003, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following seed mixing, handling and bagging operation, located at 602 North Shortridge Road, Indianapolis, Indiana 46219, is classified as registered:

- (a) Three (3) mixers, identified as 1, 2, and 3, each with a maximum capacity to process 4000 lbs of seeds per hour, controlled by baghouse identified as DT-150 with a control efficiency of 90%;
- (b) One (1) mixer, identified as bird mixer, with a maximum capacity to process 2000 lbs of seeds per hour, controlled by baghouse identified as DT-150 with a control efficiency of 90%;
- (c) One (1) mixer identified as sod quality mixer, with a maximum capacity to process 500 lbs of seeds per hour, controlled by baghouse identified as DT-150 with a control efficiency of 90%;
- (d) Two(2) storage bins with a maximum capacities of 8000 lbs and 3000 lbs respectively;
- (e) Two (2) bagging units;
- (f) other accessory equipment needed to transfer seeds.

The following conditions shall be applicable:

- (a) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following:
  - (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
- (b) Pursuant to 326 IAC 6-3-2, the particulate emissions from the Seed Mixing Equipment shall be limited by the following:

Facility	Process Weight		Particulate Emission Limit (lbs/hr)
	lbs/hr	tons/hr	
Grass Seed Mixing	8000	4	10.379
Forage Seed Mixing	4000	2	6.523
Bird Seed Mixing	2000	1	4.10
Sod Quality Mixing	500	0.25	1.619

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The Baghouse shall be in operation at all times the Seed Mixing Equipment is in operation, in order to comply with this limit.

- (c) An authorized individual shall provide an annual notice to the Indiana Department of Environmental Management, Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.1-2(f)(3). The annual notice shall be submitted to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

City of Indianapolis, Office of Environmental Services  
Air Quality Management Section, Compliance Data Group  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221-2097

no later than March 1 of each year, with the annual notice being submitted in the format attached.

This registration is the first air approval issued to this source. The source may operate according to 326 IAC 2-5.5.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) and the OES, if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original Signed by John B. Chavez  
John B. Chavez, Administrator  
Office of Environmental Services

krcc: cc: file (2 copies)  
IDEM, OAQ: Mindy Hahn

<b>Registration Annual Notification</b>
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This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3).

<b>Company Name:</b> The Cisco Companies
<b>Source Address:</b> 602 North Shortridge Road, Indianapolis IN 46219
<b>Mailing Address:</b> 602 North Shortridge Road, Indianapolis IN 46219
<b>Authorized individual:</b> Mr. Greg Hemmingsen
<b>Phone #:</b> (317) 357-7013
<b>Registration #:</b> 097-16974-00362

I hereby certify that seed mixing, handling and bagging equipment is still in operation and is in compliance with the requirements of Registration **097-16974-00362**.

<b>Name (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

**Indiana Department of Environmental Management  
Office of Air Quality  
and  
Indianapolis Office of Environmental Services**

**Technical Support Document (TSD) for a New Source Construction and  
Registration**

**Source Background and Description**

**Source Name:** The Cisco Companies  
**Source Location:** 602 North Shortridge Road, Indianapolis, IN 46219  
**County:** Marion  
**SIC Code:** 5191  
**Operation Permit No.:** 097-16974-00362  
**Permit Reviewer:** Keshav Reddy

The Indiana Department of Environmental Management, Office of Air Quality (OAQ) and the Indianapolis office of Environmental Services (OES) have reviewed an application from The Cisco Companies relating to the construction and operation of a seed mixing, handling and bagging operation.

**Unpermitted Emission Units and Pollution Control Equipment**

The source consists of the following unpermitted facilities/units:

- (a) Three (3) mixers, identified as 1, 2, and 3, each with a maximum capacity to process 4000 lbs of seeds per hour, controlled by baghouse identified as DT-150 with a control efficiency of 90%;
- (b) One (1) mixer, identified as bird mixer, with a maximum capacity to process 2000 lbs of seeds per hour, controlled by baghouse identified as DT-150 with a control efficiency of 90%;
- (c) One (1) mixer identified as sod quality mixer, with a maximum capacity to process 500 lbs of seeds per hour, controlled by baghouse identified as DT-150 with a control efficiency of 90%;
- (d) Two(2) storage bins with a maximum capacities of 8000 lbs and 3000 lbs respectively;
- (e) Two (2) bagging units;
- (f) other accessory equipment needed to transfer seeds.

**Existing Approvals**

This is the first approval issued to the source.

**Enforcement Issue**

- (a) IDEM, OAQ and OES are aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support

Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.

- (b) IDEM, OAQ and the OES are reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

### Recommendation

The staff recommends to the Administrator that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on March 25, 2003.

### Emission Calculations

See Appendix A of this document for detailed emissions calculations (5 Pages).

### Potential To Emit Before Control Equipment

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	5.41
PM-10	2.47
SO <sub>2</sub>	0.00
VOC	0.00
CO	0.00
NO <sub>x</sub>	0.00

Since the source wide PTE for particulate matter (PM) are greater than five (5) tons per year but less than twenty-five (25) tons per year for this source, section 326 IAC 2-5.1 applies. This source is a Registration.

### Actual Emissions

No previous emission data has been received from the source.

### County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	unclassifiable
SO <sub>2</sub>	maintenance attainment
NO <sub>2</sub>	attainment
Ozone	maintenance attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Marion County has been classified as attainment or unclassifiable for the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

#### Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	1.12
PM10	0.33
SO <sub>2</sub>	--
VOC	--
CO	--
NO <sub>x</sub>	--
Single HAP	--
Combination HAPs	--

This new source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

#### Part 70 Permit Determination

##### 326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

#### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

### State Rule Applicability - Entire Source

#### 326 IAC 2-6 (Emission Reporting)

This source is located in Marion County and the potential to emit PM, PM-10 are less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

#### 326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

### State Rule Applicability - Individual Facilities

#### 326 IAC 6-3-2 (Particulate emission limitations, work practices, and control technologies)

Pursuant to 326 IAC 6-3-2, the particulate emissions from the Seed Mixing Equipment shall be limited by the following:

Facility	Process Weight		Particulate Emission Limit (lbs/hr)
	lbs/hr	tons/hr	
Grass Seed Mixing	8000	4	10.379
Forage Seed Mixing	4000	2	6.523
Bird Seed Mixing	2000	1	4.10
Sod Quality Mixing	500	0.25	1.619

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The Baghouse shall be in operation at all times the seed mixing equipment is in operation, in order to comply with this limit.

### Conclusion

The construction and operation of this Seed Mixing Equipment shall be subject to the conditions of the attached proposed **New Source Construction and Registration 097-16974-00362**.

**Emissions from Sod Quality Mixing****Company Name:** The Cisco Companies**Street Address:** 602 North Shortridge Road, Indianapolis, IN 46219**County:** Marion County**Registration No. :** 097-16974-00362**Reviewer:** Keshav Reddy

Operation	Max. Rate (lbs/hr)	Max. Rate (tons/yr)	Emission Factor		Uncontrolled PTE		Cont. Eff. (%)	Controlled PTE	
			(lbs/ton) PM	lbs/ton PM-10	tons /yr PM	tons/yr PM-10		tons /yr PM	tons/yr PM-10
Mixing	500	2190	0.15	0.075	0.16	0.08	90	0.02	0.01
Bagging	500	2190	0.0033	0.0008	0.00	0.00	0	0.00	0.00
Receiving	500	2190	0.017	0.0025	0.02	0.00	0	0.02	0.00
<b>Total Emissions (tons/year) :</b>					<b>0.19</b>	<b>0.09</b>		<b>0.04</b>	<b>0.01</b>

Methodology :-

Potential Throughput (tons/year) = Maximum Rate (lbs/hr) \* Maximum Hours Of Operation (8760 hrs/yr) \* (1 ton/2000 lbs)

Uncontrolled Potential to Emit (tons/year) = Potential Throughput (tons/year) \* Emission Factor (lbs/ton) \*(1 ton/2000 lbs)

Controlled PTE (tons/year) = Potential Throughput (tons/year) \* Emission Factor (lbs/ton) \*(1 ton/2000 lbs) \* (1-(Control Efficiency/100))



**Emissions from Grass Seed Operations****Company Name:** The Cisco Companies**Street Address:** 602 North Shortridge Road, Indianapolis, IN 46219**County:** Marion County**Registration No. :** 097-16974-00362**Reviewer:** Keshav Reddy

Operation	Max. Rate (lbs/hr)	Max. Rate (tons/yr)	Emission Factor		Uncontrolled PTE		Cont. Eff. (%)	Controlled PTE	
			(lbs/ton) PM	lbs/ton PM-10	tons /yr PM	tons/yr PM-10		tons /yr PM	tons/yr PM-10
Mixing	8000	35040	0.15	0.075	2.63	1.31	90	0.26	0.13
Bagging	8000	35040	0.0033	0.0008	0.06	0.01	0	0.06	0.01
Receiving	8000	35040	0.017	0.0025	0.30	0.04	0	0.30	0.04
<b>Total Emissions (tons/year) :</b>					<b>2.98</b>	<b>1.37</b>		<b>0.62</b>	<b>0.19</b>

Methodology :-

Potential Throughput (tons/year) = Maximum Rate (lbs/hr) \* Maximum Hours Of Operation (8760 hrs/yr) \* (1 ton/2000 lbs)

Uncontrolled Potential to Emit (tons/year) = Potential Throughput (tons/year) \* Emission Factor (lbs/ton) \*(1 ton/2000 lbs)

Controlled PTE (tons/year) = Potential Throughput (tons/year) \* Emission Factor (lbs/ton) \*(1 ton/2000 lbs) \* (1-(Control Efficiency/100))

**Emissions from Forage Seed Operations**

**Company Name:** The Cisco Companies  
**Street Address:** 602 North Shortridge Road, Indianapolis, IN 46219  
**County:** Marion County  
**Registration No. :** 097-16974-00362  
**Reviewer:** Keshav Reddy

Operation	Max. Rate (lbs/hr)	Max. Rate (tons/yr)	Emission Factor (lbs/ton)		Uncontrolled PTE tons /yr		Cont. Eff. (%)	Controlled PTE tons /yr	
			PM	PM-10	PM	PM-10		PM	PM-10
Mixing	4000	17520	0.15	0.075	1.31	0.66	90	0.13	0.07
Bagging	4000	17520	0.0033	0.0008	0.03	0.01	0	0.03	0.01
Receiving	4000	17520	0.017	0.0025	0.15	0.02	0	0.15	0.02
<b>Total Emissions (tons/year) =</b>					<b>1.49</b>	<b>0.69</b>		<b>0.31</b>	<b>0.09</b>

## Methodology :-

Potential Throughput (tons/year) = Maximum Rate (lbs/hr) \* Maximum Hours Of Operation (8760 hrs/yr) \* (1 ton/2000 lbs)

Uncontrolled Potential to Emit (tons/year) = Potential Throughput (tons/year) \* Emission Factor (lbs/ton) \*(1 ton/2000 lbs)

Controlled PTE (tons/year) = Potential Throughput (tons/year) \* Emission Factor (lbs/ton) \*(1 ton/2000 lbs) \* (1-(Control Efficiency/100))

**Emissions from Bird Seed Operations**

**Company Name:** The Cisco Companies  
**Street Address:** 602 North Shortridge Road, Indianapolis, IN 46219  
**County:** Marion County  
**Registration No. :** 097-16974-00362  
**Reviewer:** Keshav Reddy

Operation	Max. Rate (lbs/hr)	Max. Rate (tons/yr)	Emission Factor		Uncontrolled PTE		Cont. Eff. (%)	Controlled PTE	
			(lbs/ton) PM	lbs/ton PM-10	tons /yr PM	tons/yr PM-10		tons /yr PM	tons/yr PM-10
Mixing	2000	8760	0.15	0.075	0.66	0.33	90	0.07	0.03
Bagging	2000	8760	0.0033	0.0008	0.01	0.00	0	0.01	0.00
Receiving	2000	8760	0.017	0.0025	0.07	0.01	0	0.07	0.01
<b>Total Emissions (tons/year) =</b>					<b>0.75</b>	<b>0.34</b>		<b>0.15</b>	<b>0.05</b>

## Methodology :-

Potential Throughput (tons/year) = Maximum Rate (lbs/hr) \* Maximum Hours Of Operation (8760 hrs/yr) \* (1 ton/2000 lbs)

Uncontrolled Potential to Emit (tons/year) = Potential Throughput (tons/year) \* Emission Factor (lbs/ton) \*(1 ton/2000 lbs)

Controlled PTE (tons/year) = Potential Throughput (tons/year) \* Emission Factor (lbs/ton) \*(1 ton/2000 lbs) \* (1-(Control Efficiency/100))

**Summary of Potential to Emit****Company Name:** The Cisco Companies**Street Address:** 602 North Shortridge Road, Indianapolis, IN 46219**County:** Marion County**Registration No. :** 097-16974-00362**Reviewer:** Keshav Reddy

Operation	UnControlled PTE (tons/year)		Controlled PTE (tons/year)	
	Pollutant		Pollutant	
	PM	PM-10	PM	PM-10
<b>Grass Seed</b>				
Mixing	2.63	1.31	0.26	0.13
Bagging	0.06	0.01	0.06	0.01
Receiving	0.30	0.04	0.30	0.04
<b>Forage Seed</b>				
Mixing	1.31	0.66	0.13	0.07
Bagging	0.03	0.01	0.03	0.01
Receiving	0.15	0.02	0.15	0.02
<b>Bird Seed</b>				
Mixing	0.66	0.33	0.07	0.03
Bagging	0.01	0.00	0.01	0.00
Receiving	0.07	0.01	0.07	0.01
<b>Sod Quality Mixing</b>				
Mixing	0.16	0.08	0.02	0.01
Bagging	0.01	0.00	0.00	0.00
Receiving	0.02	0.00	0.02	0.00
<b>Total Emissions (tons/year) =</b>	<b>5.41</b>	<b>2.47</b>	<b>1.12</b>	<b>0.33</b>